1 2 3 4 5 6	DANA A. SUNTAG (California State Bar # JOSHUA J. STEVENS (California State Bar # AMY N. SEILLIERE (California State Bar # HERUM\CRABTREE\SUNTAG A Limited Liability Partnership 5757 Pacific Avenue, Suite 222 Stockton, CA 95207 Telephone: (209) 472-7700 dsuntag@herumcrabtree.com	ar # 238105)
7	Attorneys for All Defendants	
8	UNITED STATES	S DISTRICT COURT
9	EASTERN DISTR	ICT OF CALIFORNIA
10	LLOYD THOMAS BERNARD, II, et al.,) Case No.: 2:21-cv-00172-JAM-DB
11	Plaintiffs,	Case No.: 2.21-cv-00172-JAIVI-DB
12	·	DEFENDANTS COUNTY OF SAN
13	VS.	JOAQUIN AND HUMAN SERVICES AGENCY'S REQUEST FOR JUDICIAL
14	COUNTY OF SAN JOAQUIN, et al.	NOTICE IN SUPPORT OF THEIR MOTION TO DISMISS COMPLAINT
15	Defendants.	\
16		Date: July 1, 2022 Time: 10:00 a.m.
17		Place: Courtroom 27
18		(MOTION TO DISMISS FILED
19		CONCURRENTLY]
20		_)
21		
22		
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HERUM CRABTREE SUNTAG	DEFENDANTS COUNTY OF SAN JOAQUIN AN	' ND HUMAN SERVICES AGENCY'S REQUEST FOR

DEFENDANTS COUNTY OF SAN JOAQUIN AND HUMAN SERVICES AGENCY'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION TO DISMISS COMPLAINT

Pursuant to Federal Rule of Evidence 201(b)(2), Defendants County of San Joaquin (the "County") and Human Services Agency ("HSA") respectfully request the Court to take judicial notice of the following items in support of their motion to dismiss Plaintiff's Complaint:

- A list of the County's departments is on the County's Department webpage: https://www.sigov.org/government/department-list. A true and correct copy of this webpage, listing the County's departments and their divisions (or bureaus), is **Exhibit A**. HSA is listed as a department of the County.
- The County's website for the County Administrator is located at: https://www.sjgov.org/department/cao. A true and correct copy of the County's organizational chart, located after selecting "General Information" and then "Functional Chart" from this webpage, is **Exhibit B**.
- 3. The County Administrator's webpage is located at: https://www.sigov.org/department/cao. A true and correct copy of excerpts from the "Organizational Chart 2021-22" PDF obtainable on this webpage, including the Table of Contents that lists the County Departments—including HSA—and the section of the PDF dedicated to the HSA (starting at page 14.1), showing each of its divisions (or bureaus), is <a href="https://example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/example.com/exam
- 4. True and correct copies of excerpts of the County's annual budgets for 2019 and 2020, showing the County funds HSA, are <u>Exhibit D</u>. The County's annual budgets from 2009 through 2021 are located at: https://www.sjgov.org/department/cao/county-budget. The right hand column of that page contains links for both the proposed and final budgets for each fiscal year, in descending chronological order.

A court may take judicial notice of facts that are not subject to reasonable dispute because they "can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned." Fed. R. Evid. 201(b)(2). The court "must take judicial notice if a party requests it and the court is supplied with the necessary information." Fed. R. Evid. 201(c)(2). See Emrich v. Touche Ross & Co., 846 F.2d 1190, 1198 (9th Cir. 1988) (court can take judicial notice of materials on a Rule 12(b)(6) motion); United States v. Ca., 2018 U.S. Dist. Lexis 100908, *10 (E.D. Cal. 2018) ("[t]he Court may take judicial





Departments

Agricultural Commissioner Health Care Services

Assessor / Recorder / County Clerk Human Resources

Auditor Controller Human Services Agency

Board of Supervisors Information Systems Division

Child Support Services Office of Emergency Services

Community Development Parks and Recreation

Clerk of the Board Probation

Cooperative Extension (UC Davis) Public Defender

County Administrator Public Works

County Counsel Purchasing & Support Services

District Attorney Registrar of Voters

Emergency Medical Services SJC Employee Retirement Association

Employment and Economic Development San Joaquin County General Hospital

Sheriff's Office

Stockton Metropolitan Airport

Treasurer - Tax Collector

Environmental Health

General Services

Department

5/13/22, 10:53 AM Department List

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Department List

Employment Opportunities

County Services Directory

Residents

Property & Tax Information

Road & Lane Closure Information

Parks & Recreation

Help Center

Calendar

Terms and Conditions

Privacy Policy

Enterprise System Catalog

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Employee Email

5/13/22, 10:53 AM Department List



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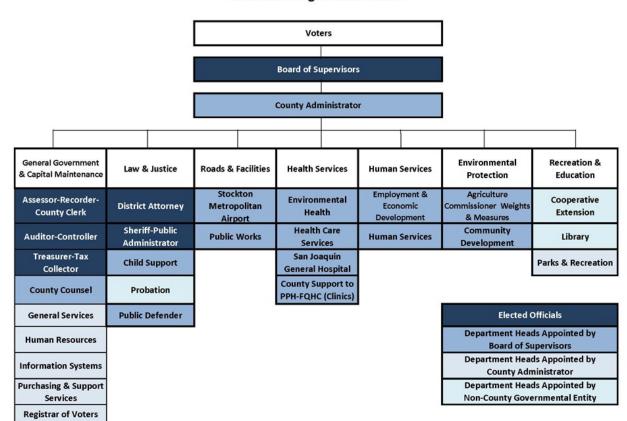


★ > Department > County Administrator > General Information > Functional Organization Chart

County Administrator's Office

Home County Budget General Information ✓ Ordinance Code Indirect Cost Rate Programs & Services ✓

County of San Joaquin Functional Organization Chart







Office of the County Administrator

Jerome C. Wilverding, County Administrator Sandra Regalo, Assistant County Administrator

November 22, 2021

2021-2022 San Joaquin County Organizational Chart

On June 23, 2021, the San Joaquin County Board of Supervisors adopted the 2021-2022 County budget and approved a total of 7,679 full-time equivalent (FTE) positions for the delivery of essential County services. The 7,679 FTE positions are comprised of 6,868 allocated positions and 811 FTE temporary/extra-help positions.

The 2021-2022 San Joaquin County Organizational Chart serves as a reference document for Board Members, the public, and County departments. This book:

- Identifies the various and diverse components of the County's organizational structure and relates the role of each organization and its sub-units as depicted by the department for 2021-2022.
- Details the total number and organizational deployment of 6,868 allocated positions approved by the Board of Supervisors for 2021-2022; temporary/extra-help positions are not included. Position changes subsequent to the adoption of the Final Budget are not reflected in this book.

This book is published to foster greater understanding of San Joaquin County government through a detailed presentation of its organizational structure.

Very truly yours,

Jerome C. Wilverding

County Administrator

County of San Joaquin Functional Organization Chart

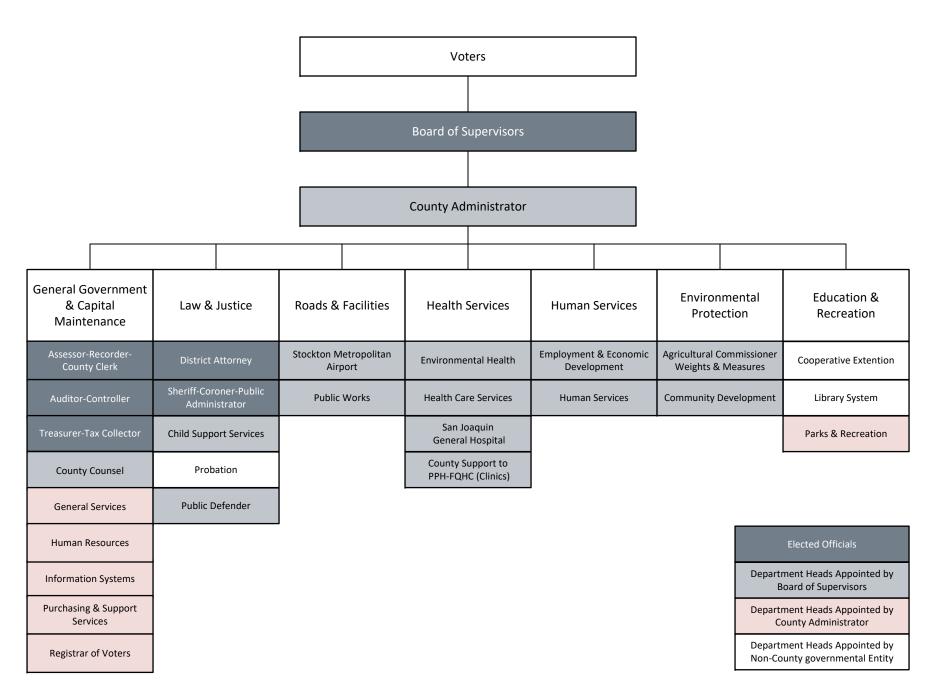


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Board of Supervisors



Miguel Villapudua, Chair, First District
Tom Patti, Vice Chair, Third District
Katherine Miller, Second District
Chuck Winn, Fourth District
Bob Elliott, Fifth District
Rachél DeBord, Clerk of the Board of Supervisors

October 24, 2019

To the Citizens of San Joaquin County:

Fiscal Year 2019-2020 County Budget

The Final Budget of San Joaquin County for the fiscal year beginning July 1, 2019, totals \$1,803,049,348. This includes the General Funds, Special Revenue Funds, Capital Project Funds, and three Enterprise operations. The Board of Supervisors adopted the Final Budget on June 26, 2019, following public hearings on the Proposed 2019-2020 County Budget.

The budget provides appropriations for the operation of all departments and agencies of County government. The budget is fully offset by estimated revenues which will finance the spending plan. The Appropriations and Sources of Funding are summarized below:

All Funds	2019-2020 Budget	Percentage of Total
Appropriations		
Departmental Appropriations	\$1,798,092,873	99.7%
Appropriations for Contingencies	4,956,475	0.3%
Total Appropriations	\$1,803,049,348	100.0%
Sources of Funding		
Departmental Revenues	\$1,484,138,758	82.3%
General Purpose Revenues	298,500,069	16.5%
Fund Balance		
General Fund	0	0.0%
All Other Funds	20,410,521	1.1%_
Total Sources of Funding	\$1,803,049,348	100.0%

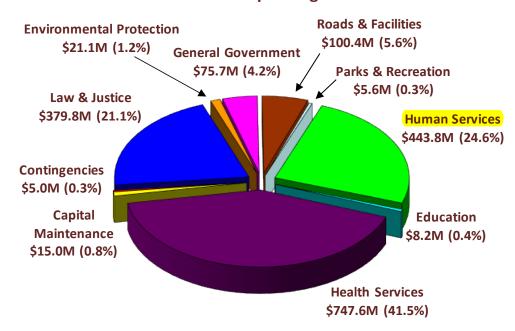
The 2019-2020 General Funds budget totals \$945,300,495, which includes an appropriation of \$4,956,475 for contingencies. The General Funds represent approximately 52.4% of the overall County budget and the Appropriations and Sources of Funding are as follows:

General Funds	2019-2020 Budget	Percentage of Total
Appropriations		
Departmental Appropriations	\$940,344,020	99.5%
Appropriations for Contingencies	4,956,475	0.5%
Total Appropriations	\$945,300,495	100.0%
Departmental Revenues	646,800,426	68.4%
Net County Cost	\$298,500,069	31.6%
Sources of Funding		
General Purpose Revenues	\$298,500,069	100.0%
Fund Balance		
General Fund	0	0.0%
Total Sources of Funding	\$298,500,069	100.0%

Spending Plan

The \$1,803,049,348 spending plan includes a basic budget totaling \$1,344,866,342 plus enterprise funds for the County Service Area (CSA) 31 – Sewer, San Joaquin General Hospital, Solid Waste Division, and Stockton Metropolitan Airport of \$458,183,005. The requirements to finance all County programs are allocated in ten functional areas as depicted below:

2019-2020 Spending Plan



Total: \$1.80 Billion

COUNTY OF SAN JOAQUIN

CAPITAL ASSETS BUDGET DETAIL FISCAL YEAR 2019-2020

EQUIPMENT

	RECOMMENDEDADOPT			OPTED	
DESCRIPTION		UNITS	AMOUNT	JNITS	AMOUNT
BUDGET UNIT - 1013000000 - REGISTRAR OF VOTERS					
3001 ELECTRONIC VOTING SYSTEM		1	\$2,160,411	1	\$2,160,411
3002 E-POLL BOOKS		1 _	489,355	1 _	489,355
	TOTAL		\$2,649,766		\$2,649,766
BUDGET UNIT - 2020200000 - DISTRICT ATTORNEY'S OFFICE					
1001 VEHICLES		1 _	\$30,000	1 _	\$30,000
	TOTAL		\$30,000		\$30,000
BUDGET UNIT - 2020300000 - DA-CHILD SUPPORT SERVICES					
1001 MODULAR WORKSTATIONS		20 _	\$176,880	20 _	\$176,880
	TOTAL		\$176,880		\$176,880
BUDGET UNIT - 2021602000 - SHERIFF - BOATING SAFETY					
1001 SONAR EQUIPMENT		3 _	\$21,000	3 _	\$21,000
	TOTAL		\$21,000		\$21,000
BUDGET UNIT - 2021609000 - CALIFORNIA METHAMPHETAMI	NE ENF	ORCEM	IENT TEAM		
1001 AIRPLANE TRANSPONDER		1 _	\$10,000	1 _	\$10,000
	TOTAL		\$10,000		\$10,000
BUDGET UNIT - 2021610000 - SHERIFF - AUTOMATED FINGER	PRINT				
3001 AUTOMATION EQUIPMENT		1 _	\$1,000,000	1 _	\$1,000,000
	TOTAL		\$1,000,000		\$1,000,000
BUDGET UNIT - 2021615000 - SHERIFF - MOUNTAIN HOUSE					
1001 INTERVIEW ROOM		1 _	\$54,543	1 _	\$54,543
	TOTAL		\$54,543		\$54,543
BUDGET UNIT - 2021616000 - SHERIFF - PORT SECURITY GRA	ANT				
1001 REGIONAL RESPONSE VESSEL		1 _	\$442,926	1 _	\$442,926
	TOTAL		\$442,926		\$442,926
BUDGET UNIT - 2021620000 - SHERIFF - PATROL					
1001 CANINES		3	\$37,500	3	\$37,500
1002 WORKSTATION		1	10,000	1 _	10,000
	TOTAL		\$47,500		\$47,500
BUDGET UNIT - 2021622000 - SHERIFF - COMMUNICATIONS					
1001 DISPATCH CONSOLES		5 _	\$135,000	5 _	\$135,000
	TOTAL	-	\$135,000	_	\$135,000
BUDGET UNIT - 2021626000 - SHERIFF - DETECTIVES					

	RECOM	MENDED	AD0	OPTED
DESCRIPTION	UNITS	AMOUNT U	NITS	AMOUNT
1001 VISION X MICROSCOPE	1	\$25,083	1	\$25,083
1002 AIRPLANE CAMERA	1	725,011	1	725,011
1003 VEHICLE	1	30,000	1	30,000
1004 VEHICLES	2	89,030	2	89,030
2001 PORTABLE RADIOS	2	12,600	2	12,600
2002 MOBILE RADIOS	2	16,000	2	16,000
	TOTAL	\$897,724		\$897,724
BUDGET UNIT - 2021645000 - SHERIFF - ADMINISTRATION/S	UPPORT SERVIC	ES		
1001 EVIDENCE ROOM DRYING CABINET 64"	2	\$24,220	2	\$24,220
1002 EVIDENCE ROOM DRYING CABINET 32"	1 _	7,811	1 _	7,811
	TOTAL	\$32,031		\$32,031
BUDGET UNIT - 2021649000 - SHERIFF - INFORMATION SYS	TEMS			
3001 STORAGE FOR FLIR CAMERA SYSTEM	1	\$19,623	1	\$19,623
3002 CAMERA SYSTEM FOR EVIDENCE ROOM	1	34,760	1	34,760
3003 HARD DRIVE ARRAY FOR BACKUP SYS	1 _	16,352	1 _	16,352
	TOTAL	\$70,735		\$70,735
BUDGET UNIT - 2021650000 - SHERIFF - LATHROP POLICE O	CONTRACT			
1001 MOTORCYCLE RADAR	1	\$3,800	1	\$3,800
1002 MOTORCYCLE	1	30,000	1	30,000
2001 MOBILE RADIOS	2	16,000	2	16,000
2002 PORTABLE RADIOS	2	12,600	2	12,600
	TOTAL	\$62,400		\$62,400
BUDGET UNIT - 2021655000 - SHERIFF - PATROL-SLESF-AB	109			
1001 LICENSE PLATE READER SYSTEM	1	\$22,089	1	\$22,089
1002 NEGOTIATIONS TACTICAL PHONE	1	13,899	1	13,899
1003 FORENSIC EXTRACTION DEVICE	1	9,903	1	9,903
1004 FUMING CHAMBER	1	13,727	1	13,727
2001 DUAL BAND RADIO	1	10,000	1	10,000
3001 DIGITAL LOGGING RECORDER	1	42,635	1	42,635
	TOTAL	\$112,253		\$112,253
BUDGET UNIT - 2021657000 - SHERIFF - CUSTODY-SLESF-A	B109			
1001 WALK-THROUGH METAL DETECTORS	8	\$94,820	8	\$94,820
1002 BARIATRIC HOSPITAL BED	1	5,360	1	5,360
1003 TRASH COMPACTORS	2	61,196	2	61,196
3001 HONOR FARM CAMERA UPGRADE	1	8,753	1	8,753
	TOTAL	\$170,129		\$170,129
BUDGET UNIT - 2021658000 - SHERIFF - COURT SERVICES				
2001 DIGITAL LOGGER	1	\$5,450	1	\$5,450
	TOTAL	\$5,450		\$5,450
BUDGET UNIT - 2022600000 - SHERIFF - CUSTODY				
1001 PORTABLE ROOM DIVIDER	1	\$6,301	1	\$6,301
1002 WORKSTATION	1	11,327	1	11,327
1003 VEHICLES	2	92,000	2	92,000

	RECOMMENDEDADOPTED				OPTED
DESCRIPTION 2001 PORTABLE RADIOS		NITS 3		AMOUNT UNITS 18,900 3	
2001 1 01(1) (822 10 (8100)	TOTAL	Ū	\$128,528	_	18,900 \$128,528
BUDGET UNIT - 2022610000 - SHERIFF - LOCAL COMMUNITY	COPPEC	TION	9		
2001 PORTABLE RADIOS	OOMALO	2	\$12,600	2	\$12,600
2001 TORINGLE IVIDIO	TOTAL	2	\$12,600	_	\$12,600
BUDGET UNIT - 2022700000 - PROBATION - JUVENILE					
1001 VEHICLE		1	\$36,000	1	\$36,000
	TOTAL		\$36,000	_	\$36,000
BUDGET UNIT - 2024700000 - AGRICULTURAL COMMISSIONI	ER				
1001 WEIGHT TRUCK CRANE		1	\$150,000	1	\$150,000
1002 ELECTRIC VEHICLE CHARGING STATION		1	35,000	1	35,000
1003 PARKING AREA FENCE EXTENSION		1	150,000	1	150,000
1004 WEIGHT TRUCK		1	200,000	1	200,000
1005 VEHICLES		2	56,000	2	56,000
	TOTAL		\$591,000	_	\$591,000
BUDGET UNIT - 2025600000 - COMMUNITY DEVELOPMENT					
1001 TERMINAL SERVER REPLACEMENT		3	\$45,000	3	\$45,000
	TOTAL		\$45,000	_	\$45,000
BUDGET UNIT - 2026000150 - HOMELAND SECURITY GRANT	S				
2001 FORENSIC LAB GENOME SEQUENCER		1	\$115,177	1	\$115,177
2002 MEDNET COMMUNICATIONS SYS		1	597,765	1	597,765
2003 TWO-WAY RADIO TRUNKING SITE		1	415,168	1	415,168
	TOTAL	·	\$1,128,110	. –	\$1,128,110
BUDGET UNIT - 3030101000 - PUBLIC WORKS - ADMINISTRA	TION				
1001 SECURITY CAMERA SYSTEM		1	\$80,000	1	\$80,000
	TOTAL		\$80,000	_	\$80,000
BUDGET UNIT - 3030103000 - PUBLIC WORKS - ENGINEERIN	G				
1001 SURVEY EQUIPMENT		1	\$6,500	1	\$6,500
	TOTAL		\$6,500	_	\$6,500
BUDGET UNIT - 3030105000 - PUBLIC WORKS - ROAD MAINT	ENANCE				
1001 BOBTAIL TRUCK		1	\$125,000	1	\$125,000
1002 STRIPING TRUCK		1	375,000	1	375,000
1003 DEBRIS COLLECTION TRUCK		1	160,000	1	160,000
1004 BARRICADE TRUCK CONVERSION		1	75,000	1	75,000
1005 AUTOMATED FLAGGING EQUIPMENT		2	50,000	2	50,000
3001 MOBILE COMPUTING DEVICES		12	11,520	12	11,520
	TOTAL		\$796,520	_	\$796,520
BUDGET UNIT - 4040500000 - MENTAL HEALTH SERVICES					
1001 VOCERA DURESS ALARM		1	\$210,000	1	\$210,000
1002 HEAT PUMPS		1	20,000	1	20,000
1003 LED OUTDOOR LIGHTING		1	125,000	1	125,000

	RECO	MMENDED	AD	OPTED
DESCRIPTION	UNITS	AMOUNT U	INITS	AMOUNT
1004 PROTECTIVE WALL SHEETS	1	48,000	1	48,000
1005 BOILER	1	100,000	1	100,000
1006 REDESIGN CYS AND OP ADMIN	1	25,000	1	25,000
1007 CUBICLE/FURNITURE - CYS AND IP	1	75,000	1	75,000
1008 24/7 ACCESS/CALL CENTER WORKSTAT	1	40,000	1	40,000
1009 VEHICLES	5	175,000	5	175,000
3001 COMPUTER EQUIPMENT	1	360,000	1	360,000
	TOTAL	\$1,178,000	_	\$1,178,000
BUDGET UNIT - 4040700000 - BEHAVIORAL HEALTH ADMII	NISTRATION			
1001 BACKFLOW VALVE REPLACEMENT	1	\$20,000	1	\$20,000
1002 PUMP AND MOTOR REPLACEMENT	1	30,000	1	30,000
1003 KEY CARD PATIO ACCESS	1 _	20,000	1 _	20,000
	TOTAL	\$70,000		\$70,000
BUDGET UNIT - 4040800000 - UTILITY DISTRICTS				
1001 MINI JET FLUSHER	1	\$5,000	1	\$5,000
1002 GROUND PENETRATING RADAR	1	50,000	1	50,000
1003 1 TON PICKUP	1	34,000	1	34,000
3001 REMOTE MONITORING EQUIPMENT	1	10,000	1	10,000
	TOTAL	\$99,000	_	\$99,000
BUDGET UNIT - 4041000000 - PUBLIC HEALTH SERVICES				
1001 MOLECULAR DIAGNOSTIC EQUIPMENT	1	\$23,000	1	\$23,000
1002 TAPE STATION UNIT	1	30,000	1	30,000
1003 SERVER RACK	1	23,000	1	23,000
1004 COMPUTER SERVERS	2	46,000	2	46,000
1005 UNINTERRUPTABLE POWER SOURCE	1	12,600	1	12,600
1006 COMPUTER SWITCHES	4	40,000	4	40,000
1007 TAPE DRIVE	1	15,000	1	15,000
1008 NETWORK EQUIPMENT	1	30,000	1	30,000
1009 DIGITAL INFRASTRUCTURE EQUIPMENT	1 _	30,000	1 _	30,000
	TOTAL	\$249,600		\$249,600
BUDGET UNIT - 5050101000 - HUMAN SERVICES AGENCY				
1001 HVAC	1	\$5,000,000	1	\$5,000,000
1002 FORKLIFT	1	75,000	1	75,000
1003 FURNITURE - INFO SYS RECONFIG	1	320,000	1	320,000
1004 FURNITURE - INTAKE RECONFIG	1	520,000	1	520,000
3001 COMPASS UPGRADE	1	30,000	1	30,000
3002 SQL 2017 UPGRADE	1	120,000	1	120,000
3003 VARONIS	1	120,000	1	120,000
3004 UPGRADE SRM SOFTWARE SYS	1	40,000	1	40,000
3005 BLADES	8	74,000	8	74,000
3006 NETWORK EQUIPMENT	1	30,000	1	30,000
3007 COMVAULT REPLACEMENT	1	220,000	1	220,000
3008 NETWORK SWITCH/CORE UPGRADE	1	624,105	1	624,105
3009 NETWORK SWITCH/CORE UPGRADE SOFTWARE	1 _	13,794	1 _	13,794
	TOTAL	\$7,186,899		\$7,186,899





2020-2021 FINAL BUDGET

Office of the County Administrator November 20, 2020



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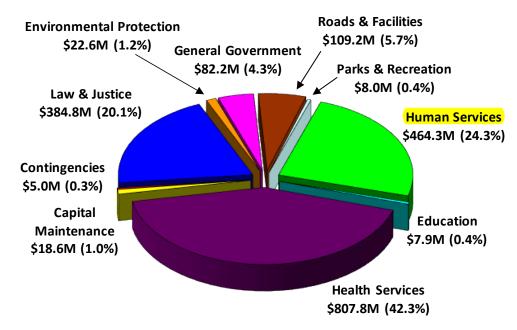
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Flact Oc	.:		004			
	-	ion				
Office Aut	Office Automation					

General Funds	2020-2021 Budget	Percentage of Total
Appropriations		
Departmental Appropriations	\$976,009,380	99.5%
Appropriations for Contingencies	5,000,000	0.5%
Total Appropriations	\$981,009,380	100.0%
Departmental Revenues	671,275,555	68.4%
Net County Cost	\$309,733,825	31.6%
Sources of Funding		
General Purpose Revenues	\$309,733,825	100.0%
Fund Balance		
General Fund	0	0.0%
Total Sources of Funding	\$309,733,825	100.0%

Spending Plan

The \$1,910,352,049 spending plan includes a basic budget totaling \$1,445,790,918 plus enterprise funds for the County Service Area (CSA) 31 – Sewer, San Joaquin General Hospital, Solid Waste Division, and Stockton Metropolitan Airport of \$464,561,131. The requirements to finance all County programs are allocated in ten functional areas as depicted below:

2020-2021 Spending Plan



Total: \$1.91 Billion

COUNTY OF SAN JOAQUIN SCHEDULE 9

DETAIL OF FINANCING SOURCES AND FINANCING USES GOVERNMENTAL FUNDS FISCAL YEAR 2020-2021

BUDGET UNIT 5050101000 - HUMAN SERVICES-ADMIN

FUND 10001 - GENERAL
FUNCTION PUBLIC ASSISTANCE
ACTIVITY ADMINISTRATION

DETAIL BY REVENUE CATEGORY AND EXPENDITURE OBJECT	2018-2019 ACTUAL	2019-2020 ACTUAL	2020-2021 RECOMMENDED	2020-2021 ADOPTED BY BOARD OF SUPERVISORS
REVENUES				
AID FROM OTHER GOVERNMENTS	150,548,539	153,847,521	190,949,113	190,949,113
MISCELLANEOUS REVENUES	3,563	8,485		
OPERATING TRANSFERS IN	4,688			
TOTAL REVENUES	150,556,790	153,856,007	190,949,113	190,949,113
EXPENDITURES/APPROPRIATIONS				
SALARIES & BENEFITS	105,966,971	108,349,428	123,937,351	123,937,351
SERVICES & SUPPLIES	43,493,249	46,954,655	60,282,226	60,282,226
CENTRALLY-BUDGETED EXPENSES	5,765,432	4,361,930	6,574,166	6,574,166
FIXED ASSETS	93,052	1,477,268	7,804,708	7,804,708
COST REIMBURSEMENTS	(4,727,266)	(7,287,097)	(7,649,338)	(7,649,338)
TOTAL EXPENDITURES/APPROPRIATIONS	150,591,437	153,856,184	190,949,113	190,949,113
NET COST	34,647	178		

PROOF OF SERVICE

I, KAYLA FRANCO, declare:

I am over the age of 18 years and not a party to this action. My business address is HERUM \ CRABTREE \ SUNTAG, 5757 Pacific Avenue, Suite 222, Stockton, CA 95207. On the date set forth below, I served the following document:

- 1. DEFENDANTS COUNTY OF SAN JOAQUIN AND HUMAN SERVICES AGENCY'S NOTICE OF MOTION AND MOTION TO DISMISS COMPLAINT; MEMORANDUM OF POINTS AND AUTHORITIES; and
- 2. DEFENDANTS COUNTY OF SAN JOAQUIN AND HUMAN SERVICES AGENCY'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF THEIR MOTION TO DISMISS COMPLAINT
- [X] BY U.S. MAIL. By enclosing the document(s) in a sealed envelope(s) addressed to the person(s) set forth below, and placing the envelope(s) for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing of correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

Pro Se Plaintiffs

Lloyd Thomas Bernhard, II Stephanie Celeste Tejada-Otero 25526 S. Bird Road Tracy, California 95304

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Signed on May 13, 2022, at Stockton, California.

KAYLA FRANCO